

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
SPARTANBURG DIVISION

JANE DOES 1-9,

Plaintiffs,

vs.

COLLINS MURPHY, SHARON  
HAMMONDS, BRENDA F. WATKINS,  
LIMESTONE UNIVERSITY, MG  
FREESITES, LTD., d/b/a PORNHUB.COM,  
MG FREESITES II LTD., MINDGEEK  
S.A.R.L., MINDGEEK USA, INC., MG  
BILLING LTD., and HAMMY MEDIA LTD.  
d/b/a XHAMSTER.COM, TRAFFICSTARS  
LTD., WISEBITS LTD, XHAMSTER IP  
HOLDINGS LTD, WISEBITS IP LTD.,

Defendants.

Case No.: 7:20-cv-00947

**WISEBITS IP, LTD'S MOTION TO  
SEAL**

JANE DOE,

Plaintiff,

vs.

LIMESTONE UNIVERSITY F/K/A  
LIMESTONE COLLEGE, COLLINS  
MURPHY, MG FREESITES, LTD., d/b/a  
PORNHUB.COM, and HAMMY MEDIA,  
LTD. d/b/a XHAMSTER.COM,

Defendants.

Case No.: 7:21-cv-03193

**WISEBITS IP, LTD'S MOTION TO  
SEAL**

1. Pursuant to Local Civil Rule 5.03, Defendant Wisebits IP, LTD (“Wisebits”)’s, by and through its undersigned counsel, submits this Motion to Seal the accompanying Exhibit of Defendant Wisebits’s Memorandum in Support of Motion for Protective Order to Preclude the Reconvening of Deposition, which is a confidential document that requires a court order to disclose. In support of this Motion, Wisebits submits the Memorandum in Support of Wisebits

IP, LTD's Motion to Seal as required by Local Civil Rule 5.03. Pursuant to Section 13.4.3 of the Court's Electronic Case Filing Policies and Procedures and Local Civil Rule 7.02, Wisebits's counsel provided notice to counsel for the Plaintiffs that Wisebits wished to file this Motion. At the time of the filing of this Motion, counsel had not received a response from opposing counsel; however, all counsels are aware that the accompanying Exhibit has been previously designated as "Confidential – Attorneys' Eyes Only".

A non-confidential descriptive index of the document that Wisebits seeks to file under seal is attached as Exhibit A. Pursuant to Section 8.1 of the Court's Electronic Case Filing Policies and Procedures, copies of the documents that Wisebits seeks to seal through this Motion will be emailed to chambers for in camera review and shall not be filed.

By signing below, counsel certifies that she has complied with Local Civil Rule 5.03 in filing this Motion.

WHEREFORE Defendant Wisebits IP, LTD respectfully requests that the Court grant the instant motion and allow the documents listed in the attached descriptive index to be filed under seal.

Respectfully submitted,

/s/ Hannah Rogers Metcalfe  
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*Attorneys for Defendant Wisebits IP, Ltd.*

February 28, 2024  
Greenville, South Carolina